

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
WESTERN DIVISION**

**ASSENTED-TO MOTION OF UNITED STATES TRUSTEE TO ENLARGE THE TIME
FOR FILING A RESPONSE OR OBJECTION TO CHAPTER 7 TRUSTEE'S MOTION
TO APPROVE SETTLEMENT AMONG TRUSTEE, NASHUA PROFESSIONAL
BASEBALL LEAGUE, LLC AND HMK ENTERPRISES, INC.**

(Request for Emergency Determination)

William K. Harrington, the United States Trustee, by and through counsel, hereby requests on an emergency basis that the Court enter an order enlarging the time for the United States Trustee to file a response or objection to the Chapter 7 Trustee’s Motion To Approve Settlement Among Trustee, Nashua Professional Baseball League, LLC And HMK Enterprises, Inc. Regarding (1) Disposition Of Claim Objection, And (2) Allowance Of Reimbursement Payment Under Section 105 As Administrative Claim (“Motion to Approve Settlement”)(ECF no. 161). In support, the UST states:

1. The deadline for the United States Trustee to file a responsive pleading is November 18, 2016. A hearing on the Motion to Approve Settlement is scheduled for December 5, 2016.

2. The United States Trustee has some concerns about, and a potential objection to, the Motion to Approve Settlement, but seeks to extend the deadline for objection or response to Wednesday, November 30, 2016. The additional time will permit the United States Trustee to

vet his concerns more fully, and perhaps resolve them, thereby limiting or eliminating matters this Court is required to adjudicate on a contested basis.

3. The Chapter 7 Trustee has indicated to the undersigned his assent to the relief requested herein.

Request for Emergency Determination

4. Because the deadline is today, the United States Trustee is requesting determination of this uncontested motion on an emergency basis.

WHEREFORE, the United States Trustee requests that the Court enter an order enlarging the time for the United States Trustee to file an objection or other written response to the Motion to Approve Settlement to November 30, 2016.

Respectfully submitted,

WILLIAM K. HARRINGTON
United States Trustee, Region 1

By: /s/ Stephen E. Meunier
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Dated: November 30, 2016

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 30th day of November, 2016, a copy of the foregoing motion was served via CM/ ECF upon the individuals who have filed pleadings or notices of appearance in the Court's CM/ECF database, including the Chapter 7 Trustee.

Dated: November 18, 2016

/s/ Stephen E. Meunier
Stephen E. Meunier